

## STATEMENT OF BASIS (AI No. 40879)

for draft Louisiana Pollutant Discharge Elimination System permit No. LA0103349 to discharge to waters of the State of Louisiana.

**THE APPLICANT IS:** C-Port, L.L.C.  
106 9th Street, Lot No. 1  
Golden Meadow, Louisiana 70357

**ISSUING OFFICE:** Louisiana Department of Environmental Quality (LDEQ)  
Office of Environmental Services  
Post Office Box 4313  
Baton Rouge, Louisiana 70821-4313

**PREPARED BY:** Michelle Bickham

**DATE PREPARED:** October 23, 2009

### 1. PERMIT STATUS

#### A. Reason For Permit Action:

Permit reissuance of a Louisiana Pollutant Discharge Elimination System (LPDES) permit for a 5-year term

#### B. LPDES permits – LA0103349

LPDES permit effective date: February 1, 2005

LPDES permit expiration date: January 31, 2010

LPDES permit modification effective dates: August 1, 2006; March 1, 2007; and August 1, 2008

#### C. Date Application Received: June 3, 2009

### 2. FACILITY INFORMATION

#### A. FACILITY TYPE/ACTIVITY - oilfield service company

C-Port, L.L.C. is an existing oilfield service company. Activities at the facility include loading and unloading of oil industry supply vessels. Materials arrive by truck and are offloaded by C-Port personnel. Materials are either stored in a warehouse or in the facility's yard. The facility transfers potable water, diesel fuel, and lubricants that are stored in tanks at the facility. Other materials handled at the facility include equipment, pumps, valves, fittings, cables, pelletized dry bulk material, drilling mud additives, blasting sand, tote bins, drums, etc.

#### B. FEE RATE

1. Fee Rating Facility Type: minor

2. Complexity Type: II

3. Wastewater Type: III

4. SIC code: 1389, 5171

#### C. LOCATION - 106 9th Street, Lot No. 1, Fourchon, Lafourche Parish Latitude 29° 07' 46", Longitude 90° 12' 54"

Statement of Basis for  
C-Port, L.L.C.  
LA0103349, AI No. 40879  
Page 2

### 3. OUTFALL INFORMATION

#### Outfall 301

Discharge Type: treated sanitary wastewater  
Treatment: sewage treatment plant with chlorination  
Location: at the point of discharge from the sewage treatment plant located on the south side of the facility  
Flow: 10,000 gpd  
Discharge Route: local drainage thence to Bayou Lafourche

#### Outfall 007

Discharge Type: treated sanitary wastewater  
Treatment: sewage treatment plant with chlorination  
Location: at the point of discharge from the sewage treatment plant located adjacent to the Clean Tank Building  
Flow: 600 gpd  
Discharge Route: directly to Bayou Lafourche

### 4. RECEIVING WATERS

STREAM - Bayou Lafourche

BASIN AND SEGMENT - Barataria Basin, Segment 020403

DESIGNATED USES -

- a. primary contact recreation
- b. secondary contact recreation
- c. propagation of fish and wildlife
- e. oyster propagation

### 5. TMDL STATUS

Subsegment 020403 is not listed on LDEQ's Final 2006 303(d) List as impaired, and to date no TMDL's have been established. A reopener clause will be established in the permit to allow for the requirement of more stringent effluent limitations and requirements as imposed by any future TMDLs.

### 6. CHANGES FROM PREVIOUS PERMIT

- Outfall 911 has been removed from the permit and the associated conditions in Other Conditions.
- The sanitary limits for Outfall 007 have been updated in accordance with the reissuance of the Class I Sanitary Discharge General Permit, and the weekly average limits have been changed to daily max limits for both sanitary discharges.

### 7. COMPLIANCE HISTORY/COMMENTS

There were no recent inspections at the facility. A spill occurred at the facility on March 24, 2008. Approximately 500 gallons of Suremul emulsifying agent was spilled on the ground in front of Slip # 1. It was cleaned up with the use of absorbent pads, and the contaminated soil was hauled away. There was no contamination of the groundwater as a result of the spill.

Statement of Basis for  
C-Port, L.L.C.  
LA0103349, AI No. 40879  
Page 3

DMR's were submitted in accordance with the existing permit. A review of the DMR's was conducted for March 2007 – March 2009. The excursions were as follows:

Date	Parameter	Outfall	Reported Value	Permit Limits
3/09	BOD	301	63 mg/L	30/45mg/L
3/09	Fecal Coliform	301	76,000 col	14/43 col/100 mL
12/08	BOD	007	60 mg/L	45 mg/L
12/08	Fecal Coliform	301	220 col	14/43 col/100 mL

## 8. EXISTING EFFLUENT LIMITS

Outfall 301 – treated sanitary wastewater

Parameter	LPDES	
	Monthly Average	Weekly Average
Flow	Report quarterly Est.	Report quarterly Est.
BOD <sub>5</sub>	30 mg/L quarterly Grab	45 mg/L quarterly Grab
TSS	30 mg/L quarterly Grab	45 mg/L quarterly Grab
Fecal Coliform	14 col/100mL quarterly Grab	43 col./100mL quarterly Grab
pH	6.0-9.0 s.u. quarterly Grab	

Outfall 911 – tank washwater from empty drilling mud and production fluid tanks and stormwater runoff from the containment area surrounding the lube oil storage tanks and from the NALCO chemical transfer station

Parameter	LPDES	
	Monthly Average	Daily Maximum
Flow	Report Continuously Continuous Recorder	Report Continuously Continuous Recorder
TSS	30.6 mg/L once every 2 weeks	45 mg/L once every 2 weeks

Statement of Basis for  
C-Port, L.L.C.  
LA0103349, AI No. 40879  
Page 4

COD	---	125 mg/L once every two weeks Grab
Total Arsenic	---	0.100 mg/L once every two weeks Grab
Total Cadmium	0.0102 mg/L once every two weeks Grab	0.0172 mg/L once every two weeks Grab
Total Chromium	---	0.150 mg/L once every two weeks Grab
Total Cobalt	18.8 mg/L once every two weeks Grab	56.4 mg/L once every two weeks Grab
Total Copper	0.242 mg/L once every two weeks Grab	0.500 mg/L once every two weeks Grab
Total Lead	---	0.150 mg/L once every two weeks Grab
Total Mercury	0.006 mg/L once every two weeks Grab	0.010 mg/L once every two weeks Grab
Total Tin	0.165 mg/L once every two weeks Grab	0.335 mg/L once every two weeks Grab
Total Zinc	---	1.0 mg/L once every two weeks Grab
Bis (2-ethylhexyl) phthalate	---	0.100 mg/L once every two weeks Grab
Butylbenzyl phthalate	0.0887 mg/L 1/2 weeks Grab	0.100 mg/L once every two weeks Grab
Carbazole	0.276 mg/L once every two weeks Grab	0.598 mg/L once every two weeks Grab
n-Decane	0.437 mg/L once every two weeks Grab	0.948 mg/L once every two weeks Grab
Flouranthene	0.0268 mg/L once every two weeks Grab	0.0537 mg/L once every two weeks Grab
n-Octadecane	0.302 mg/L once every two weeks Grab	0.589 mg/L once/two weeks Grab
pH	6.0-9.0 s.u. once every two weeks Grab	

Statement of Basis for  
C-Port, L.L.C.  
LA0103349, AI No. 40879  
Page 5

Outfall 007 – treated sanitary wastewater

Parameter	LPDES	
	Monthly Average	Weekly Average
Flow	---	Report semiannually Est.
BOD <sub>5</sub>	---	45 mg/L semiannually Grab
TSS	---	45 mg/L semiannually Grab
Fecal Coliform	---	43 col./100mL semiannually Grab
pH	6.0-9.0 s.u. semiannually Grab	

## 9. ENDANGERED SPECIES

The receiving waterbody, Subsegment 020403 of the Barataria Basin is not listed in Section II.2 of the Implementation Strategy as requiring consultation with the U.S. Fish and Wildlife Service (FWS). This strategy was submitted with a letter dated November 17, 2008 from Rieck (FWS) to Nolan (LDEQ). Therefore, in accordance with the Memorandum of Understanding between the LDEQ and the FWS, no further informal (Section 7, Endangered Species Act) consultation is required. The effluent limitations established in the permit ensure protection of aquatic life and maintenance of the receiving water as aquatic habitat. Therefore, the issuance of the LPDES permit is not likely to have an adverse effect on any endangered or candidate species or the critical habitat.

## 10. HISTORIC SITES

The discharge is from an existing facility location, which does not include an expansion on undisturbed soils. Therefore, there should be no potential effect to sites or properties on or eligible for listing on the National Register of Historic Places, and in accordance with the "Memorandum of Understanding for the Protection of Historic Properties in Louisiana Regarding LPDES Permits" no consultation with the Louisiana State Historic Preservation Officer is required.

## 11. TENTATIVE DETERMINATION

On the basis of preliminary staff review, the Department of Environmental Quality has made a tentative determination to issue a permit for the discharge described in the application.

Statement of Basis for  
C-Port, L.L.C.  
LA0103349, AI No. 40879  
Page 6

## **12. PUBLIC NOTICES**

Upon publication of the public notice, a public comment period shall begin on the date of publication and last for at least 30 days thereafter. During this period, any interested persons may submit written comments on the draft permit and may request a public hearing to clarify issues involved in the permit decision at this Office's address on the first page of the statement of basis. A request for a public hearing shall be in writing and shall state the nature of the issues proposed to be raised in the hearing.

Public notice published in:

Local newspaper of general circulation

Office of Environmental Services Public Notice Mailing List

### Rationale for C-Port, L.L.C.

1. **Outfall 301** - treated sanitary wastewater (estimated flow is 10,000 gpd)

Pollutant	Limitation		Reference
	Monthly Avg	Daily Max	
	mg/L		
Flow	Report	Report	
BOD <sub>5</sub>	30	45	Similar discharges* (BPJ), LAG540000
TSS	30	45	Similar discharges* (BPJ), LAG540000
Fecal Coliform colonies/100ml	14	43	Similar discharges* (BPJ), LAG540000
pH, s.u.	6.0 (min)	9.0 (max)	Similar discharges* (BPJ), LAG540000

**Treatment:** sewage treatment plant with chlorination

**Monitoring Frequency:** quarterly at the point of discharge from the sewage treatment plant located on the south side of the facility

**Limits Justification:** Limits and monitoring frequencies are based on current guidance for similar discharges from other industrial facilities and the Class II Sanitary Discharge General Permit, LAG540000 effective July 1, 2008.

2. **Outfall 007** - treated sanitary wastewater (estimated flow is 600 gpd)

Pollutant	Limitation		Reference
	Monthly Avg	Daily Max	
	mg/L		
Flow	Report	Report	
BOD <sub>5</sub>	30	45	Similar discharges* (BPJ), LAG540000
TSS	30	45	Similar discharges* (BPJ), LAG540000
Fecal Coliform colonies/100ml	14	43	Similar discharges* (BPJ), LAG540000
pH, s.u.	6.0 (min)	9.0 (max)	Similar discharges* (BPJ), LAG540000

**Treatment:** sewage treatment plant with chlorination

**Monitoring Frequency:** semiannually for all parameters at the point of discharge from the sewage treatment plant located adjacent to the Clean Tank Building. The Class II Sanitary Discharge General Permit LAG540000 requires quarterly monitoring; however, because of the facility's compliance with the limits for Outfall 007, the monitoring frequency will remain at semiannually.

**Limits Justification:** Limits and monitoring frequencies are based on current guidance for similar discharges from other industrial facilities and the Class II Sanitary Discharge General Permit, LAG540000 effective July 1, 2008.

Statement of Basis for  
C-Port, L.L.C.  
LA0103349, AI No. 40879  
Page 8

*	Existing permits with similar outfalls
BPJ	Best Professional Judgement
su	Standard Units

**NOTE**

For outfalls containing concentration limits, the usage of concentration limits is based on BPJ for similar outfalls since the flow is variable and estimated.

**STORM WATER POLLUTION PREVENTION PLAN (SWP3) REQUIREMENT**

An SWP3 is included in the permit because in accordance with LAC 33:IX.2511.A.1, storm water discharges shall not be required to obtain an LPDES permit "... except... discharges associated with industrial activity." In accordance with LAC 33:IX.2511.B.14.a-k, facilities classified as SIC code 1389 are considered to have storm water discharges associated with industrial activity.

**For first time permit issuance**, the SWP3 shall be prepared, implemented, and maintained within six (6) months of the effective date of the final permit. **For renewal permit issuance**, the SWP3 shall be reviewed and updated, if necessary, within six (6) months of the effective date of the final permit. The plan should identify potential sources of storm water pollution and ensure the implementation of practices to prevent and reduce pollutants in storm water discharges associated with industrial activity at the facility (see Narrative Requirements for the AI).